

IN THE SUPREME COURT OF FLORIDA

INQUIRY CONCERNING
A JUDGE NO. 02-487

Supreme Court Case
No.: SC03-1171

JOINT MOTION TO EXTEND EXPERT DISCOVERY

The Honorable Gregory P. Holder (“Judge Holder” or “Respondent”), by counsel, files with the Hearing Panel of the Florida Judicial Qualifications Commission (“the Panel”) this Joint Motion to Extend Expert Discovery, on the grounds set forth below.

1. The Third Order Scheduling Hearing and Prehearing Conference states that counsel shall complete all depositions and discovery prior to the September 1, 2004, telephonic prehearing conference.

2. The Special Counsel to the Florida Judicial Qualifications Commission (“JQC”) and Respondent have been unable to complete expert depositions of Linda James, Richard Kane, John Crow, Bruce Dekraker, Matt Kloskowski, and David Greetham.

3. JQC’s Special Counsel Charles Pillans, and Respondent’s counsel have agreed to complete the expert depositions during the weeks of September 6, and September 13, 2004.

4. Respondent’s counsel has conferred with JQC Special Counsel, who has authorized the undersigned to sign on his behalf.

WHEREFORE, the parties respectfully request that this Panel enter an order extending expert discovery until the date of the final evidentiary hearing.

Dated: September 8, 2004

Respectfully Submitted,

David B. Weinstein, Esq.
Florida Bar Number 604410
Bales Weinstein
Post Office Box 172179
Tampa, Florida 33672-0179
Telephone No.: (813) 224-9100
Telecopier No.: (813) 224-9109

Juan P. Morillo
Florida Bar No.: 0135933
Sidley Austin Brown & Wood LLP
1501 K Street, N.W.
Washington, D.C. 20005
Telephone: (202) 736-8000
Telecopier: (202) 736-8711
Counsel for Judge Gregory P. Holder

and

Charles P. Pillans, III
Florida Bar No.: 0100066
101 East Adams Street
Jacksonville, Florida 32202
Telephone: (904) 353-0211
Telecopier: (904) 353-9307
*Special Counsel to the Florida Judicial
Qualifications Commission*

CERTIFICATE OF SERVICE

I certify that on September 8, 2004, a copy of the foregoing has been served by telecopier and U.S. Mail to Ms. Brooke Kennerly, Hearing Panel Executive Director, 1110 Thomasville Road, Tallahassee, FL 32303; Honorable John P. Kuder, Chairman of the Hearing Panel, Judicial Building, 190 Governmental Center, Pensacola, FL 32501; John Beranek, Counsel to the Hearing Panel, Ausley & McMullen, P.O. Box 391, Tallahassee, Florida 32302; Charles P. Pillans, III, Esq., JQC Special Counsel, Bedell Ditmar DeVault Pillans & Coxe, P.A., The Bedell Building, 101 East Adams Street, Jacksonville, FL 32202; and, Thomas C. MacDonald, Jr., JQC General Counsel, 1904 Holly Lane, Tampa, FL 33629.

Attorney